

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

JENNIFER ROSENFELD, and DANIEL ROSENFELD,)

Plaintiffs,)

v.)

TARGET CORPORATION, *doing business as*)
TARGET PHARMACY, TARGET BRANDS, INC.,)
doing business as TARGET PHARMACY, and)
Unknown Registered Pharmacists,)

Defendants.)

and)

JENNA THERESE CHERCHIO and)
Unknown Registered Pharmacists,)

Respondents in Discovery.)

Removed from 14 L 5525

NOTICE OF REMOVAL

TARGET CORPORATION, the Defendant in the above entitled cause, seeks removal from the Circuit Court of Cook County and to the United States District Court, Northern District of Illinois, Eastern Division and, in support thereof, allege as follows:

1. This action was commenced against TARGET CORPORATION, TARGET BRANDS, INC., and Unknown Registered Pharmacists, Defendants, in the Circuit Court of Cook County, Illinois on May 22, 2015. A copy of Plaintiff's Verified Complaint was served upon Defendant TARGET CORPORATION on May 28, 2014.

2. At the time the action was commenced and since then, upon information and belief the Plaintiff was and is a citizen of the County of Cook, State of Illinois, Defendant TARGET CORPORATION was and is a corporation organized and existing under the laws of the State of Minnesota with its principal place of business in Minneapolis, Minnesota, and Co-Defendant, TARGET BRANDS, INC., which has not been served, is also a corporation organized and existing under the laws

of the State of Minnesota with its principal place of business in Minneapolis, Minnesota and consents to removal of this action.

3. The amount in controversy exceeds \$75,000.00 exclusive of interest and costs, as appears from Plaintiff's Verified Complaint. (A copy of which is attached hereto and incorporated by reference in this Notice as Exhibit "A"). Plaintiff, JENNIFER ROSENTHAL, allegedly sustained adverse and debilitating reactions due to ingestion of a prescription for the wrong medicine along with pain and suffering, mental stress and anguish, loss of normal life, loss earnings from her inability to work, a delay in the completion of her program of education seeking a master's degree in Clinical Mental Health Counseling, lost earnings for the delay and the completion of her program of education, while Plaintiff, DANIEL ROSENTHAL, allegedly sustained loss of consortium, society, services of his wife, financial expense and emotional distress. Plaintiffs have demanded \$83,229.39.

4. This action is a civil one of which the United States District Courts have original jurisdiction under 28 USC §1332.

5. The Defendant TARGET CORPORATION attaches to this notice copies of all process, pleadings, and orders that have been served on it. (A copy of which is attached hereto and incorporated by reference in this Notice as Exhibit "B").

WHEREFORE, the Defendant prays that this cause be removed to the United States District Court for the Northern District of Illinois.

BRYCE DOWNEY & LENKOV LLC

TARGET CORPORATION,

Richard W. Lenkov, #6231079
Christopher M. Puckelwartz, #6243690
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By: S:/Christopher M. Puckelwartz
One of Defendant's Attorneys

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

Christopher M. Puckelwartz, being first duly sworn on oath, deposes and says that:

1. He is the attorney for the Defendant in this cause;
2. He has prepared and read the petition for removal filed in this cause and has personal knowledge of the facts and matters contained in it; and
3. The facts and allegations contained in the petition for removal are true and correct.

BRYCE DOWNEY & LENKOV LLC

TARGET CORPORATION,

By: S:/Christopher M. Puckelwartz
One of Defendant's Attorneys

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